

July 25, 2022

The Honorable Margo Kitsy Brodie
Chief Judge of the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Courtroom: 6F
Chambers: N 626

Re: *In re Application of Forensic News LLC & Scott Stedman for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in a Foreign Proceeding*, No. 1-22-mc-01617

Dear Chief Judge Brodie:

We write with respect to the above-captioned petition for an order pursuant to 28 U.S.C. § 1782 that we filed in this Court on May 25, 2022 (the “Petition”). The petitioners are Forensic News, a long-form investigative journalism platform based in the United States, and its journalist-founder Scott Stedman (together, “Petitioners”). Petitioners are defendants in a defamation action filed in England, and in aid of their defense in that proceeding, seek discovery from Aviram Azari, who is currently detained in the Metropolitan Detention Center in Brooklyn, New York while he awaits sentencing for conspiracy to commit computer hacking, wire fraud, and identity theft, to which he pled guilty earlier this year. *See* Dkt. 2 at 6-7; *see also* Dkt. 3-11; Dkt. 3-14.¹ As set forth in the papers filed in support of the Petition, Mr. Azari likely has information material to Petitioners’ defense in the English defamation action.

Petitioners personally served Mr. Azari with the Petition on June 14, 2022, *see* Dkt. 10, and filed proof of service on June 27, 2022, *see id.* The deadline for Mr. Azari to respond to the Petition was June 28, 2022, fourteen days after the date of service of the moving papers. *See* Local R. 6.1(b)(2). Accordingly, the Petition is unopposed and ripe for adjudication.

We respectfully seek leave to serve the discovery requests attached to the Petition as soon as possible to ensure that Petitioners receive the discovery in time to prepare for trial in the English defamation action. It is especially urgent here, where Petitioners will likely face logistical issues and delays in obtaining discovery due to Mr. Azari’s incarceration.

¹ Pursuant to Section 2(A) of this Court’s Individual Practices & Rules, Petitioners have simultaneously filed and sent this letter via certified mail to Mr. Azari. Petitioners are further arranging for the New York City Sheriff’s Office to formally serve Mr. Azari personally in the Metropolitan Detention Center in Brooklyn.

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Thank you very much for your consideration.

Respectfully submitted,

/s/ Anne Champion
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